

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No.: 03-

12560RGS

DAVID DEITZEL)
Plaintiff,)
vs.)
SPRINGFIELD TERMINAL)
RAILWAY COMPANY)
Defendant.)

**DEFENDANT, SPRINGFIELD TERMINAL RAILWAY COMPANY'S,
REQUEST FOR VOIR DIRE QUESTIONS TO BE POSED TO THE JURY**

NOW COMES the defendant, Springfield Terminal Railway Company, and respectfully requests that this Honorable Court pose the following questions to each potential juror in the above captioned matter:

1. Over the last few years and today, there have been news stories and advertisements about so-called "lawsuit crisis". Have you read any newspaper or magazine articles or seen any television or heard any radio programs concerning these advertisements or news reports?
2. Do you feel or hold the view that juries generally award too much money to people that have been injured?
3. Do you have any feelings or views about the minimum amount you would be willing to award to compensate somebody for any injury?
4. Do you feel or hold the view that there should be a law that limits the amount of damages which a jury can award in any negligence action to compensate the victim for his injuries?
5. Do you feel or hold the view that there are too many unjustified negligence lawsuits in our courts?
6. Do you feel or hold the view that personal injury lawsuits have an adverse impact on people, society or the economy in general?
7. Do you feel or hold the view that personal injury lawsuits have a positive impact on people, society or the economy in general?

8. Have you, a close friend or a relative ever been sued or threatened with a lawsuit?
9. Do you know, or have you ever met, any of the parties, named witnesses or attorneys who are involved in this case?
10. Do you, or does any member of your family, work in any area of the railway profession?
11. Do you, or does any member of your family, work (or have ever worked) for any railroad?
12. Have you, a close friend or any members of your family ever made a claim against a railroad? If so, would this impact your ability to judge the facts this case impartially?
13. Have you, a close friend or any members of your family ever made a claim against an employee of a railroad? If so, would this impact your ability to judge the facts of this case impartially?
14. Have you, a close friend or any members of your family ever sued a railroad or an employee of a railroad? If so, would this impact your ability to judge the facts of this case impartially?
15. Will you base your verdict upon evidence presented at trial and upon the law the judge will give you in his instructions?
16. Does any juror have a reason to believe that he/she cannot render a fair and impartial verdict in this case?

Respectfully submitted,
By the Defendant,
Springfield Terminal Railway Corporation,
By its attorneys,

/s/

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DATED: